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8 Attorneys for Plaintiffs
9 Alberto Justo Rodriguez Licea,
10 Fernando Alonso Hernandez and
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

ALBERTO JUSTO RODRIGUEZ
LICEA, FERNANDO ALONSO
HERNANDEZ and LUIS ALBERTO
CASANOVA TOLEDO individually,

Plaintiffs,

vs.

CURACAO DRYDOCK COMPANY,
INC., A/K/A CURACAOSE
DOKMAATSCHAPPIJ NV, A/K/A
CDMV,

Defendants.

No.: 3:14-mc-01498

**NOTICE OF WITHDRAWAL AND
DISMISSAL OF WRITS OF
GARNISHMENT**

JOINT NOTICE OF WITHDRAWAL AND DISMISSAL OF WRITS OF GARNISHMENT

Plaintiffs/Judgment Creditors, Alberto Justo Rodriguez Licea, Fernando Alonso Hernandez, and Luis Alberto Casanova Toledo (collectively “Plaintiffs” or “Judgment Creditors”), and Garnishees Dole Food Company, Inc. (“Dole”) and Ventura Trading Limited (“Ventura”) (collectively “Garnishees”) hereby file this Joint Notice of Withdrawal and Dismissal of Writs of Garnishment and state as follows:

1. Plaintiffs served writs of execution and notices of levy (the “Writs”) on Garnishees.

See dkt. 5 (writ directed to Dole) and dkt. 4 (writ directed to Ventura).

2. Plaintiffs and Garnishees have agreed that the notices of levy should be dissolved, with prejudice and each party shall pay its own attorneys' fees and costs.

3. Nothing herein shall constitute an admission by Garnishees of the validity of the Writs or by Plaintiffs of the validity of any defense to the Writs.

Wherefore, Plaintiffs and Garnishees Dole Food Company, Inc. and Ventura Trading Limited hereby request an Order declaring the Writs (dkt. 4 and dkt. 5) dissolved with prejudice.

Dated: August 5, 2015

Respectfully submitted,

REED SMITH LLP

By:/s/ Jeffrey C. Ingram

Jeffrey C. Ingram
Attorneys for Plaintiffs

Dated: August 5, 2015

Respectfully submitted,

KEESAL, YOUNG & LOGAN

By:/s/ David D. Piper

David D. Piper
Attorneys for Garnishees

PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is REED SMITH LLP, 355 South Grand Avenue, Suite 2900, Los Angeles, California 90071-1514. On August 6, 2015, I served the following document(s) by the method indicated below:

**NOTICE OF WITHDRAWAL AND DISMISSAL OF WRITS OF
GARNISHMENT**

- by transmitting via facsimile on this date from fax number +1 213 457 8080 the document(s) listed above to the fax number(s) set forth below. The transmission was completed before 5:00 PM and was reported complete and without error. The transmission report, which is attached to this proof of service, was properly issued by the transmitting fax machine. Service by fax was made by agreement of the parties, confirmed in writing. The transmitting fax machine complies with Cal.R.Ct 2003(3).
- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California addressed as set forth below. I am readily familiar with the firm's practice of collection and processing of correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in this Declaration.
- by placing the document(s) listed above in a sealed envelope(s) and consigning it to an express mail service for guaranteed delivery on the next business day following the date of consignment to the address(es) set forth below. A copy of the consignment slip is attached to this proof of service.

PLEASE SEE ATTACHED SERVICE LIST.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on August 6, 2015, at Los Angeles, California.

/s/ Evelyn Rodriguez
Evelyn Rodriguez

1 **SERVICE LIST**
2

3 David D. Piper, Esq.
4 Law Offices of Keesal, Young & Logan
5 400 Oceangate
6 Long Beach, California 90802

7 Ventura Trading Ltd.
8 Attn. Mr. D. Sesin
9 Canon's Court
10 22 Victoria Street
11 PO Box HM 1179
12 Hamilton HM EX
13 Bermuda

14 Dole Corporate Headquarters
15 I Dole Drive
16 Westlake Village, CA 91362

17 REED SMITH LLP
18 A limited liability partnership formed in the State of Delaware
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